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**REMARKS**

Claims 1-2, 8-12, and 14 stand rejected in the present Office Action. In this response, claims 1, 8, 10-12, and 14 are amended. Accordingly, claims 1-2, 8-12, and 14 are pending and under consideration in the present application. Applicants respectfully request reconsideration of the present application in view of the foregoing amendments and reasons.

**35 U.S.C. § 102 rejection**

In Sections 3-11 of the Office Action, claims 1-2, 8-12, and 14 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,018,343 (Wang et al.). In particular, the Examiner stated that:

Regarding independent claim 1, Wang discloses a computer implemented method for generating web content (see col. 3, lines 35-50, it is a Java widget to generate Web content) comprising the acts of: reading a control file (this is inherent to the operation of a widget); loading a model file (in lines 40-45, there is a model file, so it must have been loaded); processing the model file (the model file is processed to offer GUI-paradigms, see lines 40-50); transforming the model file using a widget library (see col. 3, lines 35-50, it is a Java widget to generate Web content based on a model); transforming the transformed model file using a view transformation file to produce the web content (see col. 3, lines 35-50, it is a Java widget to generate Web content based on a model, this would inherently require a file to produce the web content).

Regarding dependent claim 2, Wang discloses that the act of processing the model file includes processing a tag from a tag library (this would be inherent to producing web content, which is Web based), generating a Java class (see col. 3, lines 35-50, it is a Java widget to generate Web content) and producing a model instance (the model file is processed to offer GUI-paradigms, see lines 40-50). . . .

Regarding independent claim 8, it is a more broadly claimed version of the limitations contained in claims 1 and 2 and it is rejected under similar rationale. . . .

Regarding independent claim 10, it is an apparatus that performs the method of claim 1 and is rejected under similar rationale.

Regarding independent claim 11, it is a variant of the method of claim 1 except that it refers to serialized data. However, a Web/Java application platform as in Wang inherently operates on serialized data. Hence, it can be rejected in an analogous manner.

Regarding independent claim 12, it is an apparatus that performs the method of claim 1 and is rejected under similar rationale. . . .

Regarding independent claim 14, it is a series of computer readable program products that perform the method of claim 1, and is rejected under similar rationale.

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Each of amended independent claims 1 and 11 now recites, among other things, that the model file, widget library, and view transformation file are identified by the control file. Each of amended independent claims 8, 10, 12, and 14 now recites, among other things, that the web content is generated from a model-view-widget paradigm.

No new matter is added. Support for the amendments are found in the present application as filed. "The control file 862 is simply a file that identifies the model file 864, the view file 866 and the widget library 868 to use to produce the final HTML result 870." See page 90, lines 28-30; page 95, lines 9-19. And "[c]ontent product and presentation separation is achieved by following a Model-View-Widget (MVW) paradigm." Page 97, lines 7-8.

The three components that supply the various aspects of web content (the model file, widget library, and view file) are linked together by a fourth component (the control file). This provides great flexibility and efficiency because there is "separat[ion of] data production, interaction elements[,] and display information." Page 87, lines 25-28. The "separation between Model, Widget, and View instructions" "makes it easier to customize pages, to provide different versions of pages to different user agents (desktop browsers, handheld devices, etc.)" Page 97, lines 4-6; page 87, lines 24-28. For example, data contained in a given model file may be associated with a certain widget library and view file for display in a browser, and be associated with a different widget library and/or view file for display as an ad banner. This model file may further be associated with yet another different widget library and/or view file for display in a pop-up screen. Not only is data information separated from presentation information, the presentation information is further separated into "interactivity (fields, link) or [] presentation only (images)" information (e.g., widget library) and layout (or stylesheet) information (e.g., view file). See page 90, lines 3-19.

In contrast, Wang et al. discloses a "model-view paradigm," wherein data is displayed (in a GUI type of display) by associating a model object with a view object. Wang states that a "[m]odel-view paradigm [is a] method for GUI programming in which all displayed data contents are controlled by an independent model object (emphasis added)" and that "for each view object, there is a model object controlling its contents." "The purpose behind a *model-view paradigm* is to

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de-couple display functions from application functions (emphasis added).” See col. 5, lines 46-54; col. 3, lines 41-42.

Each of amended independent claims 8, 10, 12, and 14 recites, among other things, that the web content is generated from a model-view-widget paradigm. Wang et al. discloses display of data content using a model-view paradigm. Each of amended independent claims 1 and 11 recites utilizing a model file, widget library, and view transformation file to generate web content (e.g., three components to supply the various aspect of web content). Wang et al.’s displayed data is supplied by information in a model object and a view object (e.g., a two component approach).

The Examiner appears to be characterizing the “Java visual table widget (vTable)” in Wang et al. as the claimed widget library. Applicants respectfully disagree with the Examiner’s characterization. Wang et al. states that the “vTable is a programmable *layout manager that supports data presentation in two dimensional grids, rows, columns, and cells* (emphasis added).” Col. 3, lines 38-40. Wang et al. continues on to state that “for each view object, there is a model object controlling its contents” and that there “can be multiple views associated with a single model.” Col. 3, lines 41-43. Hence, it appears that although the vTable is referred to as a “widget,” Wang et al. is using the term “widget” interchangeably with the term “view” or “view object.” Wang et al.’s presentation information is encapsulated in one component – the view object. If in fact Wang et al. disclosed a “widget” distinct from a “view object,” then Wang et al. would not disclose a two component paradigm – the “model-view paradigm.”

In contrast, Applicants’ claims recite the presentation information being supplied by two components – the widget library and the view file. Applicants’ claims 1 and 11 recite, among other things, a widget library, and this widget library being a distinct component from each of a view file, model file, and control file. Applicants’ claims 1 and 11 further recite the model file, widget library, and view file associated together by the control file. Wang et al. fails to disclose a widget library distinct from each of a view file, model file, and control file. Wang et al. also fails to disclose the model file, view file, and widget library associated together by a control file.

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The Examiner stated that the step of "transforming ... using a view transformation file to produce the web content," "would inherently require a file to produce the web content." The Examiner appears to state that the view transformation file is inherent in Wang et al. The Examiner also states that the step of "reading a control file" is "inherent to the operation of a widget." The Examiner appears to state that the control file is also inherent in Wang et al. Applicants respectfully submit that a rejection under 35 U.S.C. § 102 requires each and every element recited in the claims to be disclosed in a single prior art reference.

Alternatively, even if Wang et al. is assumed to disclose a vTable widget, the view transformation file is "inherent," and the control file is "inherent," as characterized by the Examiner, Wang et al. still fails to disclose the combination of elements recited in each of amended independent claims 1, 8, 10-12, and 14. For example, Wang et al. does not disclose the model file, widget library, and view transformation file identified by the control file, as recited in each of amended independent claims 1 and 11. As another example, Wang et al. does not disclose that the web content is generated from a model-view-widget paradigm, as is recited in each of amended independent claims 8, 10, 12, and 14.

Accordingly, it is respectfully submitted that each of amended independent claims 1, 8, 10-12, and 14 is allowable over Wang et al. It is also respectfully submitted that claims 2 and 9, which depend from one of claims 1 or 8, are also allowable over Wang et al. for at least the same reasons as for claims 1 and 8.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

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In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952 referencing docket no. 360322000300. However, the Commissioner is not authorized to charge the cost of the issue fee to the Deposit Account.

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